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Attorneys for Defendants  
WELLS FARGO & COMPANY, WACHOVIA MORTGAGE  
CORPORATION, WACHOVIA BANK, N.A., WACHOVIA  
SECURITIES, LLC, WACHOVIA SECURITIES FINANCIAL  
NETWORK, LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

JORGE V. RAGDE, JR. AND JENNIFER J.  
RAGDE, On Behalf of Themselves and All  
Others Similarly Situated,

Plaintiff,

v.

WELLS FARGO & COMPANY, WACHOVIA  
MORTGAGE CORPORATION, WACHOVIA  
BANK, N.A., WACHOVIA SECURITIES, LLC,  
WACHOVIA SECURITIES FINANCIAL  
NETWORK, LLC, WACHOVIA  
CORPORATION, and DOES 1-10 Inclusive,

Defendants.

Case No. C 09-0226-SI

**STIPULATION AND  
[PROPOSED] ORDER FOR  
EXTENSION OF TIME TO  
RESPOND TO COMPLAINT**

WHEREAS, on February 18, 2009, the parties submitted an amended stipulation to extend the defendants' time to respond to plaintiffs' initial complaint to April 2, 2009;

WHEREAS, on March 30, 2009, the parties submitted a second stipulation to extend the defendants' time to respond to plaintiffs' initial complaint to May 4, 2009;

WHEREAS, on April 30, 2009, the parties submitted a third stipulation to extend the defendants' time to respond to plaintiffs' initial complaint to June 8, 2009;

**STIP FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT**

Case No. C 09-0226 SI  
sf-2736035

1 WHEREAS, on June 4, 2009, the parties submitted a fourth stipulation to extend the  
2 defendants' time to respond to plaintiffs' initial complaint to July 8, 2009;

3 WHEREAS, on July 6, 2009, the parties submitted a fifth stipulation to extend the  
4 defendants' time to respond to plaintiffs' initial complaint to August 7, 2009;

5 WHEREAS, on August 5, 2009, the parties submitted a sixth stipulation to extend the  
6 defendants' time to respond to plaintiffs' initial complaint to September 4, 2009;

7 WHEREAS, the Initial Case Management Conference in this matter is currently scheduled  
8 for Friday, September 18, 2009 at 2:30 p.m.;

9 WHEREAS, the Parties, through their counsel, have reached an agreement in principle to  
10 settle this matter and are in the process of finalizing the settlement documentation;

11 IT IS HEREBY STIPULATED AND AGREED pursuant to Local Rule 6-1(a), and  
12 Federal Rule of Civil Procedure 12(a), by and between plaintiffs Jorge V. Ragde, Jr. and Jennifer  
13 J. Ragde and defendants Wells Fargo & Company, Wachovia Mortgage Corporation, Wachovia  
14 Bank, N.A., Wachovia Securities, LLC, Wachovia Securities Financial Network, LLC, Wachovia  
15 Corporation, through their respective attorneys, that the time by which defendants may plead or  
16 otherwise respond to the Complaint shall be extended to and include **Friday, October 9, 2009**.

17 IT IS FURTHER STIPULATED AND AGREED pursuant to Northern District Local  
18 Rules 6-2(a), 7-12, and 16-2(e), that the Initial Case Management Conference currently scheduled  
19 for **Friday, September 18, 2009** shall be continued to **Friday, October 23, 2009**. All other case  
20 management deadlines shall be vacated, pending final resolution of this matter.

1 Dated: September 4, 2009

JEFFREY F. KELLER  
KATE SCANLAN  
KELLER GROVER LLP.

2  
3  
4 By /s/ Kathleen R. Scanlan  
Kathleen R. Scanlan

5  
6 Attorneys for Individual and Representative  
Plaintiff JORGE V. RAGDE, JR. and JENNIFER  
7 J. RAGDE

8 Dated: September 4, 2009

JAMES R. McGUIRE  
NATALIE NAUGLE  
MORRISON & FOERSTER LLP

9  
10 By /s/ James R. McGuire  
James R. McGuire

11  
12 Attorneys for Defendant WELLS FARGO &  
13 COMPANY, WACHOVIA MORTGAGE  
CORPORATION, WACHOVIA BANK, N.A.,  
14 WACHOVIA SECURITIES, LLC, WACHOVIA  
SECURITIES FINANCIAL NETWORK, LLC,  
15 WACHOVIA CORPORATION

16 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

17  
18 Dated:

By:   
Judge Susan Illston

**GENERAL ORDER 45 ATTESTATION**

In accordance with General Order 45, concurrence in the filing of this document has been obtained from Kathleen R. Scanlan and I shall maintain records to support this concurrence for subsequent production for the court if so ordered or for inspection upon request by a party.

Date: September 4, 2009

By /s/ James R. McGuire

James R. McGuire

Attorneys for Defendant WELLS FARGO &  
COMPANY, WACHOVIA MORTGAGE  
CORPORATION, WACHOVIA BANK, N.A.,  
WACHOVIA SECURITIES, LLC, WACHOVIA  
SECURITIES FINANCIAL NETWORK, LLC,  
WACHOVIA CORPORATION